UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FIC, L.P., individually, and on behalf of all others similarly situated,

Plaintiff,

- against -

No. 07 Civ. 11633 (48)

BEAR STEARNS ASSET MANAGEMENT INC., RALPH CIOFFI, RAYMOND McGARRIGAL, MATTHEW TANNIN, BEAR, STEARNS SECURITIES CORP., THE BEAR STEARNS COMPANIES INC. and BEAR, STEARNS & CO. INC.,

Defendants.

Stipulation and [Proposed] Order

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IT IS HEREBY STIPULATED AND AGREED by the parties to this action, through their undersigned counsel, as follows:

- 1. The time within which defendants may answer, move with respect to, or otherwise respond to the complaint in this action shall be extended to and including April 4, 2008.
- 2. In the event that one or more of the Defendants determines to file a motion in lieu answering the complaint, plaintiff shall file and serve any papers in opposition to each such motion on or before June 2, 2008, and any reply papers in further support of any such motion shall be filed and served on or before July 2, 2008.

Dated: New York, New York January 29, 2008

Grant & Eisenhofer P.A.

By: Sidney S. Liebesman (SL-8444)
485 Lexington Avenue, 29th Floor
New York, New York 10017
(646) 722-8500

Attorneys for Plaintiff

Hughes Hubbard & Reed LLP

Edward J.M. Little (EL-2321)
Marc. Weinstein (MW-3715)
One Battery Park Plaza
New York, New York 10004
(212) 837-6000

Attorneys for Defendant Ralph Cioffi

Kramer Leyin/Naffalis & Frankel LLP

By: Stephen M. Sinaiko (SS-2147)

1177 Avenue of the Americas New York, New York 10036 (212) 715-9100

Attorneys for Defendants Bear Stearns Asset Management Inc., Bear, Stearns Securities Corp., The Bear Stearns Companies Inc., and Bear, Stearns & Co. Inc.

Driscoll & Redlich

Catherine L. Redlich (CL-6946)
Cori Browne (CB-9408)

521 Fifth Avenue, Suite 3300
New York, New York 10175
(212) 986-4030

Attorneys for Defendant Raymond McGarrigal

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Dated: New York, New York January 28, 2008

Grant & Eisenhofer P.A.

Kramer Levin Naftalis & Frankel LLP

By:	By:
Sidney S. Liebesman (SL-8444)	Stephen M. Sinaiko (SS-2147)
485 Lexington Avenue, 29th Floor	1177 Avenue of the Americas
New York, New York 10017	New York, New York 10036
(646) 722-8500	(212) 715-9100
Attorneys for Plaintiff	Attorneys for Defendants Bear Stearns Asset Management Inc., Bear, Stearns Securities Corp., The Bear Stearns Companies Inc., and Bear, Stearns & Co. Inc.
Hughes Hubbard & Reed LLP	Driscoll & Redlich
By:	By:
Edward J.M. Little (EL-2321)	Catherine L. Redlich (CL-)
Marc. Weinstein (MW-3715)	Cori Browne (CB-
One Battery Park Plaza	521 Fifth Avenue, Suite 3300
New York, New York 10004	New York, New York 10175
(212) 837-6000	(212) 986-4030
Attorneys for Defendant Ralph Cioffi	Attorneys for Defendant Raymond McGarriga

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- In the event that one or more of the Defendants determines to file a motion 2. in lieu answering the complaint, plaintiff shall file and serve any papers in opposition to each such motion on or before June 2, 2008, and any reply papers in further support of any such motion shall be filed and served on or before July 2, 2008.

Dated: New York, New York January 28, 2008

Grant & Eisenhofer P.A. Kramer Levin Naftalis & Frankel LLP By: _ Sidney S. Liebesman (SL-8444) Stephen M. Sinaiko (SS-2147) 485 Lexington Avenue, 29th Floor 1177 Avenue of the Americas New York, New York 10017 New York, New York 10036 (646) 722-8500 (212) 715-9100 Attorneys for Defendants Bear Stearns Asset Attorneys for Plaintiff Management Inc., Bear, Steams Securities Corp., The Bear Stearns Companies Inc., and Bear, Stearns & Co. Inc. Hughes Hubbard & Reed LLP Driscoll & Redlich By: Catherine Klederch

Edward J.M. Little (EL-Marc. Weinstein (MW-One Battery Park Plaza New York, New York 10004 (212) 837-6000

Attorneys for Defendant Ralph Cioffi

Catherine L. Redlich (CL-CY) Cori Browne (CB-9%) 521 Fifth Avenue, Suite 3300

New York, New York 10175 (212) 986-4030

Attorneys for Defendant Raymond McGarrigal

Brune & Richard LLP

Nina Beattie (NB-0399)

Theresa Trzaskoma (TT-4175)

80 Broad Street

New York, New York 10004

(212) 668-1900

Attorneys for Defendant Matthew Tannin

SO ORDERED this of January, 2008.

U.S.D.J.